

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KYKO GLOBAL, INC., a Canadian corporation, and KYKO GLOBAL GMBH, a Bahamian corporation,

Plaintiffs,

V.

11 PRITHVI INFORMATION SOLUTIONS, LTD., a Pennsylvania  
12 corporation, PRITHVI CATALYTIC, INC., a Delaware  
13 corporation, PRITHVI SOLUTIONS, INC., a Delaware  
14 corporation, PRITHVI INFORMATION SOLUTIONS  
15 INTERNATIONAL, LLC, a Pennsylvania limited liability  
16 company, INALYTIX, Inc., a Nevada corporation,  
17 INTERNATIONAL BUSINESS SOLUTIONS, INC., a North  
18 Carolina, corporation, AVANI INVESTMENTS, Inc., a  
19 Delaware corporation, ANANYA CAPITAL Inc., a Delaware  
20 corporation, MADHAVI VUPPALAPATI AND ANANDHAN  
21 JAGARAMAN, husband and wife and the marital community  
composed thereof, GURU PANDYAR AND JANE DOE  
PANDYAR, husband and wife and the marital community  
composed thereof, and SRINIVAS SISTA AND JOHN DOE  
SISTA, husband and wife and the marital community composed  
thereof, DCGS, INC., a Pennsylvania company, EPP, INC., a  
Washington corporation, FINANCIAL OXYGEN, INC. a  
Washington corporation, HUAWEI LATIN AMERICAN  
SOLUTIONS, INC., a Florida corporation, L3C, INC., a  
Washington corporation.

## Defendants.

NO.: 2:13-cv-01034

**DECLARATION OF  
ANANDHAN JAYARAMAN  
IN SUPPORT OF MOTION  
TO DISQUALIFY**

**NOTE ON MOTION  
CALENDAR: June 6, 2014**

1 ANANDHAN JAYARAMAN pursuant to 28 U.S.C. § 1746 declares as follows:

2       1. My name is Anandhan Jayaraman. I am over the age of 18 years and competent to  
3 testify as to the contents set forth herein. I make this declaration based on my own personal  
4 knowledge. When Plaintiffs filed this lawsuit they spelled my name incorrectly as Anandhan  
5 Jagaraman.

6       2. I am the husband of Madhavi Vuppala. When I was notified of the Sheriff's  
7 Sale of our personal property would occur at 10:00 a.m. on April 24, 2014 at Western Van &  
8 Storage, 8521 S. 90<sup>th</sup> St. Kent, Washington, I arranged for a family friend to go to the auction to  
9 bid on the computer, D-link back up device and my bike. I told her the approximate worth of the  
10 items, \$300 for the computer, \$100 for the backup device approximately \$650.00 -\$700.00 for  
11 the bike. I gave our family friend approximately, \$1500.00 to purchase all of the items.  
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13       3. I did not anticipate that the Plaintiffs' lawyer would try to bid for our items. I just  
14 assumed our friend would be bidding against the average person. It appears that the lawyer for  
15 Kyko out-bid our family friend.

16       4. I was the primary user of the the d-link external backup device ("d-link device")  
17 that the Plaintiffs' purchased from the auction. The d-link device had two hard-disks which  
18 mirrored each other. One of the disks had been reformatted recently. Additionally, the d-link  
19 device had a password. To access the data through "normal" means, Plaintiffs would have  
20 required the password.

21       5. Although I cannot remember all the data that was located on the d-link harddrive,  
22 I do know that the vast majority of information was personal in nature, family photos, my  
23 personal emails, etc. There might have been some of Madhavi's information on the d-link from  
24 2007-2008. However, there would be no reason for any documents related to this lawsuit or  
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1 Plaintiffs' claims on that device. Importantly, I do not believe that the d-link would have  
2 contained any sensitive or privileged information on it.

3 I declare under penalty of perjury under the laws of Washington State and the laws of the  
4 United States that the foregoing is true and correct.

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6 Executed on: 21<sup>st</sup> day of May 2014 in Bellevue, WA.

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ANANDHAN JAYARAMAN

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## **CERTIFICATE OF SERVICE**

I hereby certify that on May 22, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Christina L. Haring-Larson, Keith Pitt  
Christina@slindenelson.com, Amanda@slindenelson.com, Keith@slindenelson.com

Dated this 22<sup>nd</sup> day of May 2014

/s/ Mark D. Kimball  
Mark D. Kimball, WSBA No. 13146